

EXCEPTIONS

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

LEA MÁRQUEZ PETERSON, CHAIRWOMAN
SANDRA D. KENNEDY, COMMISSIONER
JUSTIN OLSON, COMMISSIONER,
ANNA TOVAR, COMMISSIONER
JIM O'CONNOR, COMMISSIONER

IN THE MATTER OF THE APPLICATION OF
ARIZONA PUBLIC SERVICE COMPANY FOR A
RULING RELATING TO ITS 2021 DEMAND SIDE
MANAGEMENT IMPLEMENTATION PLAN

Docket No. E-01345A-20-0151

**SWEEP Comments & Proposed
Amendment**

**Comments and Proposed Amendment of the Southwest Energy Efficiency Project
On the Commission Staff's Recommended Opinion and Order
On Arizona Public Service Company's 2021 Demand Side Management Plan**

The Southwest Energy Efficiency Project (SWEEP) appreciates the opportunity to submit these comments on the Commission Staff's Recommended Opinion and Order (ROO) on Arizona Public Service Company's (APS) 2021 Demand Side Management (DSM) Implementation Plan.¹

SWEEP thanks the Commission Staff for its analysis and efforts to review the 2021 DSM plan.

We strongly support Commission approval of the ROO, including the recommended increase in the Demand-Side Management Adjustor Charge (DSMAC), with the two modifications discussed below.

Approval of the ROO will save all Arizonans money by avoiding the need to construct unnecessary, costly utility infrastructure; support thousands of family-wage jobs that can't be outsourced; save water; and eliminate air pollution that sickens Arizonans and ups our health care costs. Additionally, approval of the ROO is especially important now as the state continues to recover from the COVID-19 pandemic.

SWEEP recommends that the ROO be modified as follows:

1. Enhanced incentives to assist customers adversely impacted by COVID-19 should be continued until further order of the Commission.
2. The amendment of Diné CARE, Tó Nizhóní Ání, and Black Mesa Trust² should be adopted to ensure that the expansion of the Tribal Communities Energy Efficiency Program is implemented in accordance with Decision No. 78052.

I. Enhanced incentives to assist customers adversely impacted by COVID-19 should be continued until further order of the Commission

SWEEP thanks the Commission for its leadership last year to approve enhanced incentives to assist customers adversely impacted by the COVID-19 pandemic, including its approval of special offerings for emergency HVAC replacement and low-income weatherization.

¹ <https://docket.images.azcc.gov/E000014299.pdf?i=1625587489603>

² <https://docket.images.azcc.gov/E000014522.pdf?i=1625714596314>

Given the uncertainties with the pandemic, the recent unprecedented heat waves (which have underscored the need for energy conservation to avoid crippling power outages), and the pending proposal by APS to increase its rates (which, if approved, would necessitate greater availability of tools and services to help customers manage their electricity bills), SWEEP believes it is appropriate to continue these incentives until further order of the Commission versus the end of 2021 as recommended by Staff.

This approach would ensure that these incentives are not ended prematurely and that they are not abruptly stopped and started. The latter is a particularly important consideration with respect to emergency HVAC replacement, which can be a matter of life and death and for which timing is of the essence.

SWEEP Proposed Amendment No. 1 addresses this recommendation.

II. The amendment of Diné CARE, Tó Nizhóní Ání, and Black Mesa Trust should be adopted to ensure that the expansion of the Tribal Communities Energy Efficiency Program is implemented in accordance with Decision No. 78052

SWEEP supports the amendment of Diné CARE, Tó Nizhóní Ání, and Black Mesa Trust³ to ensure that the expansion of the Tribal Communities Energy Efficiency Program is implemented in accordance with Decision No. 78052. SWEEP agrees that delaying the expansion of the program until the Commission reviews and approves the utility's 2022 DSM plan could inadvertently lead to several years of delay.

We respectfully submit these comments on July 7, 2021.

Ellen Zuckerman

Co-Director, Utility Program, SWEEP

Caryn Potter

Manager, Utility Program, SWEEP

³ Ibid at 2.

SWEEP PROPOSED AMENDMENT NO. 1

TIME/DATE PREPARED:

COMPANY: Arizona Public Service Company **AGENDA ITEM NO.:** 30

DOCKET NO.: E-01345A-20-0151 **OPEN MEETING:** July 13, 2021

Purpose: To allow the continuation of enhanced incentives until further order of the Commission given the uncertainties with the pandemic, the recent unprecedented heat waves (which have underscored the need for energy conservation to avoid crippling power outages), and the pending proposal by APS to increase its rates (which, if approved, would necessitate greater availability of tools and services to help customers manage their electricity bills).

At Page 25, Line 9, DELETE "as discussed herein" and REPLACE WITH:

"until further order of the Commission"

At Page 25, Lines 15-16, DELETE "as discussed herein" and REPLACE WITH:

"until further order of the Commission"

At Page 25, Lines 21, DELETE "as discussed herein" and REPLACE WITH:

"until further order of the Commission"

****MAKE CONFORMING CHANGES**